

EMISSIONS UNIT (EU) NO./ Description (See below)	TITLE V PERMIT TERM NO & Description	ACTUAL METHOD USED TO DETERMINE COMPLIANCE	DATE/ TIME START	DATE/ TIME END	DESCRIPTION AND MAGNITUDE OF THE DEVIATION	PROBABLE CAUSE FOR THE DEVIATION	CORRECTIVE ACTIONS / PREVENTATIVE MEASURES TAKEN
P006 (COPPER CALCINER)	A.II.2-Pressure drop across each baghouse shall be maintained within the range of 1 to 5 "WC while the emissions unit is in operation	Daily pressure drop readings for the calciner draft baghouse	01/08/13	02/18/13	Daily ΔP reading of less than 1"WC for the calciner draft baghouse	Low air flow	Baghouse maintenance work order issued on 02/11/13; ΔP reading above 1"WC on 02/19/13
P006 (COPPER CALCINER)	A.II.2-Pressure drop across each baghouse shall be maintained within the range of 1 to 5 "WC while the emissions unit is in operation	Daily pressure drop readings for the calciner draft baghouse	02/25/13	02/26/13	Daily ΔP readings of 0.4 and 0.7"WC for the calciner draft baghouse	Low air flow	ΔP reading above 1"WC on 02/27/13 and remained above 1"WC for remainder of reporting period
P006 (COPPER CALCINER)	A.II.2-Pressure drop across each baghouse shall be maintained within the range of 1 to 5 "WC while the emissions unit is in operation	Daily pressure drop readings for the calciner feed hopper baghouse	02/27/13	02/27/13	Daily ΔP reading of 0.4"WC for the calciner feed hopper baghouse	Low air flow	ΔP reading above 1"WC on 02/28/13
P006 (COPPER CALCINER)	A.II.2-Pressure drop across each baghouse shall be maintained within the range of 1 to 5 "WC while the emissions unit is in operation	Daily pressure drop readings for the calciner feed hopper baghouse	03/04/13	03/05/13	Daily ΔP reading of less than 1"WC for the calciner feed hopper baghouse	Low air flow	ΔP reading above 1"WC on 03/06/13 and remained above 1"WC for remainder of reporting period
P009 (ROTARY CALCINER #4)	A.II.2-The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 "WC while the emissions unit is in operation.	Daily pressure drop readings	01/15/13	01/16/13	Daily ΔP readings between 7.2 and 8"WC for baghouse 4B	Filter media/air flow issues	ΔP readings below 4.5 on 2 nd shift of 01/16/13
P009 (ROTARY CALCINER #4)	A.II.2-The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 "WC while the emissions unit is in operation.	Daily pressure drop readings	01/28/13	02/04/13	Daily ΔP readings less than 0.3"WC for baghouse 4A	Air flow issues	Shutdown on 02/05 for maintenance; returned to operation on 02/10 with a ΔP of 1"WC
P009 (ROTARY CALCINER #4)	A.II.2-The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 "WC while the emissions unit is in operation.	Daily pressure drop readings	03/03/13	03/03/13	Daily ΔP readings of 0.2"WC for baghouse 4A	Air flow issues	Daily ΔP readings of 0.5"WC on 03/04/13
P009 (ROTARY CALCINER #4)	A.II.2-The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 "WC while the emissions unit is in operation.	Daily pressure drop readings	03/09/13	03/13/13	Daily ΔP readings of 0.2"WC for baghouse 4A	Air flow issues	Daily ΔP readings greater than 1"WC on 03/17/13
P009 (ROTARY CALCINER #4)	A.II.2-The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 "WC while the emissions unit is in operation.	Daily pressure drop readings	03/20/13	03/23/13	Daily ΔP readings between 4.0 and 5.0"WC for baghouse 4B	Air flow issues	Calciner #4 shutdown on 03/24/13 and did not operate for remainder of reporting period

P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/15/13	01/19/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/19/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 4"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	01/15/13 16:00	01/15/13 24:00	ΔP of 4.4"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of less than 4"WC across second stage at 24:00 on 1/15/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/15/13 16:00	01/16/13 16:00	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 3"WC across second stage at 16:00 on 1/16/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 4"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	01/19/13 00:00	01/19/13 08:00	ΔP of 4.7"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/19/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/20/13 8:00	01/20/13 24:00	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/21/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/26/13	02/04/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 02/04/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/26/13 00:00	01/31/13 16:00	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 3"WC across second stage at 16:00 on 01/31/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 4"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	01/28/13 16:00	01/28/13 24:00	ΔP of 4.2"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of less than 4"WC across second stage at 24:00 on 01/28/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	02/11/13 08:00	02/11/13 16:00	ΔP of 2"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of less than 1.5"WC across first stage at 16:00 on 02/11/13

P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	02/24/13 00:00	02/24/13 16:00	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 02/24/13 before 16:00
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	03/03/13	03/03/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/13/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	03/03/13 16:00	03/03/13 24:00	ΔP of 2.7"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 3"WC across second stage at 24:00 on 03/03/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 4"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	03/07/13 16:00	03/13/13	ΔP less than 1"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/13/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	03/09/13 08:00	03/13/13	ΔP less than 3"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/13/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	03/17/13	03/23/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/23/13
P009 (ROTARY CALCINER #4)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	03/17/13	03/23/13	ΔP less than 3"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/23/13
P009 (ROTARY CALCINER #4)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	01/28/13 16:00	01/28/13 24:00	Stage 2 scrubber water flow rate of 30 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 65 gpm on 01/28/13 at 24:00
P009 (ROTARY CALCINER #4)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	02/11/13 08:00	02/11/13 16:00	Stage 2 scrubber water flow rate of 42 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 50 gpm on 02/11/13 at 16:00

P009 (ROTARY CALCINER #4)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 3 Trimer scrubber water flow rate readings	02/11/13 08:00	02/11/13 16:00	Stage 3 scrubber water flow rate less than 50 gpm	Scrubber water feed issues	Adjustments made; stage 3 scrubber water flow rate maintained above 50 gpm on 02/11/13 at 21:00
P009 (ROTARY CALCINER #4)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	03/11/13 01:00	03/11/13 17:00	Stage 2 scrubber water flow rate of 44 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 50 gpm on 03/11/13 at 17:00
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/01/13	01/01/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/02/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/01/13	01/01/13	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/02/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/05/13	01/05/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/06/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/05/13	01/05/13	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/06/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/07/13 16:00	01/08/13 8:00	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/08/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/07/13 16:00	01/08/13 8:00	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/08/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/13/13 00:00	01/14/13 8:00	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/14/13

P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/13/13 00:00	01/14/13 8:00	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/14/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 4"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	01/14/13 00:00	01/14/13 8:00	ΔP of 4.5"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 01/14/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 1.5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	03/02/13	03/08/13	ΔP greater than 1.5"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/08/13
P010 (ROTARY CALCINER #1)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	03/03/13 16:00	03/03/13 24:00	ΔP of 2.7"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 3"WC across second stage at 24:00 on 03/03/13
P070 (CU/CR Strike Tanks)	A.II.1- The pressure drop across the Interstates Plastic scrubber shall be continuously maintained at a value not less than 1"WC at all times while the emissions unit is in operation.	Records of pressure drop readings	01/24/13	01/25/13	ΔP less than 1"WC across scrubber	Scrubber water flow rate/air flow issues	Work order issued on 01/24/13; ΔP of 4.6"WC across scrubber on 01/26/13
P070 (CU/CR Strike Tanks)	A.II.1- The pressure drop across the Interstates Plastic scrubber shall be continuously maintained at a value not less than 1"WC at all times while the emissions unit is in operation.	Records of pressure drop readings	03/08/13	03/09/13	ΔP less than 1"WC across scrubber	Scrubber water flow rate/air flow issues	Work order issued on 03/08/13; ΔP of 4.2"WC across scrubber on 03/10/13
P070 (CU/CR Strike Tanks)	A.II.1- The pressure drop across the Interstates Plastic scrubber shall be continuously maintained at a value not less than 1"WC at all times while the emissions unit is in operation.	Records of pressure drop readings	03/16/13	03/17/13	ΔP less than 1"WC across scrubber	Scrubber water flow rate/air flow issues	Work order issued on 03/16/13; ΔP of 4.2"WC across scrubber on 03/18/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 0.6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	01/22/13	02/03/13	ΔP greater than 0.6"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 02/03/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 3"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	01/22/13 16:00	02/03/13 24:00	ΔP of 4.2"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 02/03/13

P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	01/23/13 00:00	01/31/13 16:00	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 3"WC across second stage at 16:00 on 01/31/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 0.6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	02/13/13	02/25/13	ΔP greater than 0.6"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 02/25/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the first stage of the scrubber shall be continuously maintained between 0 and 0.6"WC at all times while the emissions unit is in operation.	Pressure drop readings across the first stage of the Trimer scrubber	03/08/13	03/31/13	ΔP greater than 0.6"WC across first stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/31/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 3"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	03/08/13	03/18/13	ΔP of less than 1"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of greater than 1"WC across second stage at 09:00 on 03/18/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the third stage of the scrubber shall be continuously maintained between 3 and 5"WC at all times while the emissions unit is in operation.	Pressure drop readings across the third stage of the Trimer scrubber	03/09/13	03/31/13	ΔP less than 3"WC across third stage	Scrubber water flow rate/inlet exhaust flow issues	Calciner shutdown on 03/31/13
P080 (ROTARY CALCINER #5)	B.II.1-The pressure drop across the second stage of the scrubber shall be continuously maintained between 1 and 3"WC at all times while the emissions unit is in operation.	Pressure drop readings across the second stage of the Trimer scrubber	03/26/13 01:00	03/27/13 17:00	ΔP of greater than 3"WC across second stage	Scrubber water flow rate/inlet exhaust flow issues	ΔP of less than 3"WC across second stage at 17:00 on 03/27/13
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	01/28/13 16:00	01/28/13 24:00	Stage 2 scrubber water flow rate of 30 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 65 gpm by 24:00 on 01/28/13
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 1 Trimer scrubber water flow rate readings	02/18/13 08:00	02/18/13 16:00	Stage 1 scrubber water flow rate of 44 gpm	Scrubber water feed issues	Adjustments made; stage 1 scrubber water flow rate maintained above 65 gpm by 16:00 on 02/18/13
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	03/11/13 01:00	03/11/13 17:00	Stage 2 scrubber water flow rate of 44 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 50 gpm on 03/11/13 at 17:00

P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	03/23/13 17:00	03/24/13 17:00	Stage 2 scrubber water flow rate of 46 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 50 gpm on 03/24/13 at 17:00
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 1 Trimer scrubber water flow rate readings	03/25/13 08:00	02/18/13 16:00	Stage 1 scrubber water flow rate of 20 gpm	Scrubber water feed issues	Adjustments made; stage 1 scrubber water flow rate maintained above 65 gpm by 16:00 on 02/18/13
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 3 Trimer scrubber water flow rate readings	03/26/13 09:00	03/27/13 09:00	Stage 3 scrubber water flow rate less than 50 gpm	Scrubber water feed issues	Adjustments made; stage 3 scrubber water flow rate maintained above 50 gpm on 03/27/13 at 09:00
P080 (ROTARY CALCINER #5)	B.II.1-The scrubber water flow rate to each stage of the scrubber shall be continuously maintained at a value of not less than 50 gpm at all times while the emissions unit is in operation.	Stage 2 Trimer scrubber water flow rate readings	03/27/13 09:00	03/27/13 17:00	Stage 2 scrubber water flow rate of 37 gpm	Scrubber water feed issues	Adjustments made; stage 2 scrubber water flow rate maintained above 50 gpm on 03/27/13 at 17:00
P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	01/11/13 16:00	01/13/13 16:00	ΔP readings across Viron Scrubber 3 of less than 1"WC	Scrubber water flow rate/air flow issues	Pressure drop readings consistently above 1"WC on 01/13/13 at 16:00
P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	01/17/13 00:00	01/17/13 08:00	ΔP readings across Viron Scrubber 3 of less than 1"WC	Scrubber water flow rate/air flow issues	Pressure drop readings consistently above 1"WC on 01/17/13 at 08:00
P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	01/23/13 08:00	01/31/13 24:00	ΔP readings across Viron Scrubber 3 fluctuating between 0.1 and 2.7"WC	Scrubber water flow rate/air flow issues	Pressure drop readings above 1"WC on 01/31/13 at 24:00
P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	02/06/13 16:00	02/15/13 08:00	ΔP readings across Viron Scrubber 3 fluctuating between 0.2 and 3.5"WC	Scrubber water flow rate/air flow issues	Pressure drop readings above 1"WC on 02/15/13 at 24:00
P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	02/23/13 00:00	02/26/13 24:00	ΔP readings across Viron Scrubber 3 fluctuating between 0.5 and 2.3"WC	Scrubber water flow rate/air flow issues	Pressure drop readings above 1"WC on 02/26/13 at 24:00

P086 (Gen Cat P&S Dryers #2)	A.II.1.a-The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1"WC at all times while the emissions unit is in operation.	Pressure drop readings across Viron Scrubber 3	03/02/13 16:00	03/30/13 24:00	ΔP readings across Viron Scrubber 3 fluctuating between 0.2 and 3.7"WC	Scrubber water flow rate/air flow issues	Pressure drop readings above 1"WC on 03/30/13 at 24:00
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	01/13/13 16:00	01/13/13 24:00	Scrubber 3 liquor pH of 5	pH adjustment issues	pH of the scrubber liquor adjusted; pH above 6 at 24:00 on 01/13/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	01/15/13 16:00	01/16/13 16:00	Scrubber 3 liquor pH of less than 6	pH adjustment issues	pH of the scrubber liquor adjusted; pH above 6 at 16:00 on 01/16/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	01/17/13 08:00	01/17/13 16:00	Scrubber 2 liquor pH of 11.4	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 16:00 on 01/17/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	01/18/13 16:00	01/18/13 24:00	Scrubber 2 liquor pH of 11.2	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 01/18/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	01/21/13 00:00	01/22/13 08:00	Scrubber 2 liquor pH fluctuating between 8.3 and 11.9	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 01/22/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	01/25/13 16:00	01/25/13 24:00	Scrubber 2 liquor pH of 12.9	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 01/25/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	01/26/13 16:00	01/26/13 24:00	Scrubber 3 liquor pH of 11.3	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 01/26/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	01/29/13 00:00	01/29/13 08:00	Scrubber 2 liquor pH of 11.9	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 01/29/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	01/28/13 00:00	01/29/13 08:00	Scrubber 3 liquor pH fluctuating between 8.8 and 13.8	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 01/29/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	02/04/13 16:00	02/05/13 24:00	Scrubber 2 liquor pH fluctuating between 8.1 and 13.3	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 02/05/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	02/09/13 08:00	02/09/13 16:00	Scrubber 2 liquor pH of 12.1	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 16:00 on 02/09/13

P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/09/13 00:00	02/09/13 24:00	Scrubber 3 liquor pH greater than 11	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 02/09/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/11/13 08:00	02/12/13 08:00	Scrubber 3 liquor pH greater than 11	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 02/12/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/15/13 16:00	02/15/13 24:00	Scrubber 3 liquor pH of 11.9	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 02/15/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/18/13 16:00	02/18/13 24:00	Scrubber 3 liquor pH of 12.6	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 02/18/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	02/20/13 00:00	02/20/13 16:00	Scrubber 2 liquor pH of 11.2	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 16:00 on 02/20/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/22/13 16:00	02/23/13 16:00	Scrubber 3 liquor pH between 1.4 and 14	pH adjustment issues	pH of the scrubber liquor adjusted; pH between 6 and 11 at 16:00 on 02/23/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	02/26/13 00:00	02/26/13 08:00	Scrubber 2 liquor pH of 11.3	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 02/26/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #3 liquor pH	02/26/13 08:00	02/26/13 16:00	Scrubber 2 liquor pH of 11.7	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 16:00 on 02/26/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	02/28/13 00:00	02/28/13 08:00	Scrubber 2 liquor pH of 11.11	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 02/28/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	03/13/13 00:00	03/13/13 08:00	Scrubber 2 liquor pH of 11.97	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 08:00 on 03/13/13
P086 (Gen Cat P&S Dryers #2)	B.II.1-The pH of the scrubber liquor shall be maintained within the range of 6 to 11 s.u.	Viron Scrubber #2 liquor pH	03/15/13 16:00	03/15/13 24:00	Scrubber 2 liquor pH of 11.54	pH adjustment issues	pH of the scrubber liquor adjusted; pH below 11 at 24:00 on 03/15/13
P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across discharge baghouse	01/02/13 16:00	01/04/13 16:00	Δ P reading between 0.85 and 0.99"WC	Low air flow	Δ P reading above 1"WC by 16:00 on 01/04/13

P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across draft baghouse	01/03/13 16:00	02/18/13 16:00	ΔP reading fluctuating between 0 and 1.2"WC	Low air flow	Work order issued on 02/11/13; ΔP reading above 1"WC by 24:00 on 02/18/13
P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across discharge baghouse	01/25/13 00:00	02/17/13 16:00	ΔP reading of fluctuating between 0 and 1.3"WC	Low air flow	Work order issued on 02/11/13; ΔP reading above 1"WC by 16:00 on 02/17/13
P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across draft baghouse	02/26/13 00:00	03/01/13 16:00	ΔP reading fluctuating between 0.95 and 1.7"WC	Low air flow	ΔP reading consistently above 1"WC by 16:00 on 03/01/13
P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across discharge baghouse	03/07/13 16:00	03/10/13 16:00	ΔP reading of fluctuating between 0.97 and 1.1"WC	Low air flow	ΔP reading consistently above 1"WC by 01:00 on 03/11/13
P095 (Copper Calciner #2)	A.II.1-The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6"WC while the emissions unit is in operation.	Daily pressure drop readings across draft baghouse	03/17/13 01:00	03/31/13 09:00	ΔP reading fluctuating between 0.5 and 2.1"WC	Low air flow	ΔP reading above 1"WC by 17:00 on 03/31/13
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	01/19/13	01/20/13	ΔP readings of 1.6"WC	Scrubber water flow rate/inlet exhaust flow issues	Scrubber ΔP reading above 2"WC by 08:00 on 01/21/13
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	01/24/13 08:00	01/30/13 08:00	ΔP readings between 1.4 and 1.6"WC	Scrubber water flow rate/inlet exhaust flow issues	PK Blender shutdown on 01/30/13
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	02/12/13 16:00	02/17/13 24:00	ΔP readings between 1.4 and 1.6"WC	Scrubber water flow rate/inlet exhaust flow issues	PK Blender shutdown on 02/18/13; ΔP of 2"WC at startup
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	02/25/13 16:00	02/25/13 24:00	ΔP reading of 1.5"WC	Scrubber water flow rate/inlet exhaust flow issues	PK Blender shutdown on 02/26/13
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	03/02/13 00:00	03/03/13 16:00	ΔP readings of 1.5"WC	Scrubber water flow rate/inlet exhaust flow issues	PK Blender shutdown at 16:00 on 03/03/13

P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	03/07/13 00:00	03/07/13 16:00	ΔP readings of 1.5"WC	Scrubber water flow rate/inlet exhaust flow issues	Scrubber ΔP reading of 2"WC by 16:00 on 03/07/13
P099 (PK Blender #2)	B.II.2-The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2"WC at all times while the emissions unit is in operation	Pressure drop readings across the scrubber	03/12/13 08:00	03/16/13 24:00	ΔP readings between 0.5 and 2"WC	Scrubber water flow rate/inlet exhaust flow issues	PK Blender shutdown on 03/17/13
P099 (PK Blender #2)	B.II.3-The pressure drop across the baghouse shall be maintained within the range of 3 to 5"WC while the emissions unit is in operation	Daily pressure drop readings across the baghouse	01/25/13 08:00	01/25/13 16:00	ΔP readings of 1.5"WC	Low air flow	ΔP reading above 3"WC by 16:00 on 01/25/13
P099 (PK Blender #2)	B.II.3-The pressure drop across the baghouse shall be maintained within the range of 3 to 5"WC while the emissions unit is in operation	Daily pressure drop readings across the baghouse	01/27/13 16:00	01/30/13 08:00	ΔP readings between 0.5 and 2"WC	Low air flow	PK Blender shutdown on 01/30/13
P099 (PK Blender #2)	B.II.3-The pressure drop across the baghouse shall be maintained within the range of 3 to 5"WC while the emissions unit is in operation	Daily pressure drop readings across the baghouse	02/12/13 16:00	02/17/13 24:00	ΔP readings between 2 and 3"WC	Low air flow	PK Blender shutdown on 02/18/13; ΔP of 3"WC at startup
P099 (PK Blender #2)	B.II.3-The pressure drop across the baghouse shall be maintained within the range of 3 to 5"WC while the emissions unit is in operation	Daily pressure drop readings across the baghouse	03/12/13 08:00	03/16/13 24:00	ΔP readings between 1.6 and 2.5"WC	Low air flow	PK Blender shutdown on 03/17/13
P103 (Rotary Calciner #3)	B.II.1-NOx emissions from this emission unit shall be controlled by one of the following air pollution control equipment: the F-1 scrubber, the Trimer Scrubber, or the Salem-Engelhard SCR unit.	Visual observation	01/23/13 15:04	01/23/13 15:19	15 minute discharge of emissions from the F-1 scrubber estimated at 30 pounds of NOx	F-1 scrubber drain line froze and ruptured causing failure of scrubber	Emissions from Calciner #3 were rerouted to another control device.